

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

IN RE:  
Pete J. Kinney  
  
Debtor

Case No: 23-31301  
Chapter 13  
  
JUDGE GUY R. HUMPHREY

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**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION  
OF AMENDED PLAN (DOC 25 )**

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The Chapter 13 Trustee objects to confirmation of the Debtor's amended plan (Doc 25 ), and as provided by 11 U.S.C. §1302(b)(2) recommends the plan not be confirmed, all as more fully set forth in the attached memorandum.

A plan has not been confirmed.

/s/ John G. Jansing  
John G. Jansing 0040926  
Chapter 13 Trustee  
409 E Monument Ave. Suite 410  
Dayton, OH 45402-1161  
(937) 222-7600 FAX (937) 222-7383  
email: chapter13@dayton13.com

23-31301 KINNEY

The Debtor has filed an amended plan that leaves the monthly plan payment set at \$1235.00 and increases the percent to be paid to the general unsecured creditors from 0% to 5%.

The Trustee's analysis is that the plan will not complete in 60 months as required by 11 U.S.C. §1322(d). The plan appears to be closer to a 66 month plan. The Trustee's further analysis is that the plan would need payments of \$1296.00 per month to complete in 60 months.

CERTIFICATE OF SERVICE

23-31301

I hereby certify that a copy of the Chapter 13 Trustee's Objection To Confirmation Of Amended Plan was served **electronically** on the date of the filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **First Class Mail** on December 8, 2023 addressed to:

Pete J. Kinney  
1625 Cornell Dr.  
Dayton, OH 45406

/s/ John G. Jansing  
John G. Jansing, Trustee